

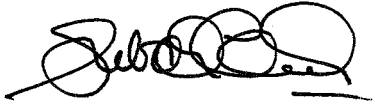
**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

TRACIE HUNTER, <i>et al.</i>, Plaintiffs v. HAMILTON COUNTY BOARD OF ELECTIONS, <i>et al.</i> Defendants	CASE NO.: 1:10-cv-00820 Chief Judge Susan J. Dlott
SECOND DECLARATION OF SUBODH CHANDRA	

I, Subodh Chandra, respectfully declare as follows:

1. Exhibit 1 contains the revised invoice required by the Court's order of September 3, 2013.
2. Exhibit 2 contains an invoice for remaining contemporaneously recorded, but previously unbilled, time in the case through this October 18 date. Although my standard rate in 2012 increased to \$435/hr, in the exercise of billing judgment and discretion in this matter, that increased rate is not reflected on this invoice. In the further exercise of billing judgment, I did not record certain time spent on the matter, and our firm is not seeking a few hours of time spent by one of my law-firm colleagues, who bills at \$350/hr.

I declare the above to be true under penalty of perjury of the laws of the United States of America.

A handwritten signature in black ink, appearing to read 'Subodh Chandra', with a horizontal line extending to the right from the end of the signature.

Subodh Chandra

Executed on October 18, 2013

Oct 01, 2013
Hunter v. Hamilton County Bd. of Education
Invoice # 230

T H E
CHANDRA
L A W F I R M L L C

Chandra Law Firm, LLC
1265 West 6th St., Suite 400
Cleveland, OH 44113.1326
216.578.1700 www.ChandraLaw.com

Billed To
Northeast Ohio Coalition for the Homeless, SEIU
Local 1199, et al.

invoice

Billable Time	\$8,804.50
Expenses	\$5.76
	\$8,810.26
Taxes	\$0.00
	\$8,810.26
Retainer Applied	\$0.00
	\$8,810.26
Previous Balance	\$0.00
Total Owing (due by: Oct 01, 2013)	\$8,810.26

invoice details

Item	Hrs / Qty	Rate / Price	Subtotal
2010.11.01 Subodh Chandra	00:48	\$400.00	\$320.00
Coordination with Ohio Democratic Party; analyze brief; edit and comment on preliminary-injunction brief; further consideration of strategy regarding same.			
2010.11.22 Subodh Chandra	00:18	\$400.00	\$120.00
Attention to our clients' motion to intervene and complaint in Hunter case. Attention to hearing results from co-counsel and docket. Attention to Court's order granting motion for TRO.			
2010.11.23 Subodh Chandra	00:18	\$400.00	\$120.00
Attention to motion to intervene by Ohio Republican Party; attention to notice of appeal; attention to amended answer to complaint. Further consideration of all of the above. Communications with co-counsel re appellate action.			
2010.11.26 Subodh Chandra	00:06	\$400.00	\$40.00
Attention to and consideration of Sixth Circuit order staying District Court's order. Further consideration of implications of same for status quo and protection of clients. Attention to notice of transcript of proceedings before Judge Dlott.			
2010.12.02 Subodh Chandra	00:18	\$400.00	\$120.00
Follow up activity regarding Hamilton County appeal. Attention to notice from Sixth Circuit dissolving stay; analyze same. Attention to various communications from co-counsel and respond to same.			
2010.12.03 Subodh Chandra	00:06	\$400.00	\$40.00
Attention to Jennifer Branch's letter for Hunter regarding proposed implementation procedure for Judge Dlott's preliminary injunction order. Further consideration of same and impact on our clients. Attention to Williams statement of appeal issues.			

Item	Hrs / Qty	Rate / Price	Subtotal
2010.12.06 Subodh Chandra	01:00	\$400.00	\$400.00
Conference call with co-counsel. Attention to communication from Tim Burke. Further consideration of same. Communication with co-counsel. Attention to Williams brief.			
2010.12.07 Subodh Chandra	00:30	\$400.00	\$200.00
Discussion with Gentry re valuable information obtained; communications with counsel for allied parties regarding strategy and edited proposed consent agreement. Attention to Sixth Circuit order re clerk decision on expedited briefing.			
2010.12.09 Subodh Chandra	00:12	\$400.00	\$80.00
Various communications with co-counsel regarding putative petition for en banc hearing filed by Williams; attempts to access petition. Various additional co-counsel communications. Attention to petition for re-hearing before original panel. Attention to update from Jennifer Branch regarding Board of Elections activity. Attention to Ohio Republican Party's motion to file amicus brief.			
2010.12.10 Subodh Chandra	00:06	\$400.00	\$40.00
Attention to response to petition for en banc hearing filed by Hunter.			
2010.12.13 Subodh Chandra	00:18	\$400.00	\$120.00
Attention to and consideration of various court filings and provide commentary regarding same.			
2010.12.17 Subodh Chandra	00:12	\$400.00	\$80.00
Attention to and careful consideration of Sixth Circuit order denying petition for rehearing.			
2010.12.21 Subodh Chandra	00:12	\$400.00	\$80.00
Communications with co-counsel re brief drafts. Attention to Hunter's motions for extension of time to file briefs and various court filings.			
2010.12.22 Subodh Chandra	00:12	\$400.00	\$80.00
Communications with co-counsel re brief filings. Provide consent regarding same. Further consideration of All Writs Act analysis provided by co-counsel and weigh in regarding same.			

Item	Hrs / Qty	Rate / Price	Subtotal
2010.12.23 Subodh Chandra	00:30	\$400.00	\$200.00
Edit Hunter draft all writs act motion for co-counsel and provide comments regarding same; attention to Court's hearing schedule and communications with co-counsel regarding same.			
2010.12.26 Subodh Chandra	00:06	\$400.00	\$40.00
Attention to Williams' response to All Writs Act motion. Attention to allied parties' counsel comments on motion to intervene in Supreme Court of Ohio collateral-attack matter.			
2010.12.30 Subodh Chandra	00:06	\$400.00	\$40.00
Attention to and consideration of Hunter pleading.			
2011.01.07 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to Williams reply brief.			
2011.01.10 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to incoming pleadings.			
2011.01.11 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to and consideration of communications with litigation team. Attention to list of research issues provided by co-counsel.			
2011.01.12 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to Court's order to enforce judgment and various communications with co- and allied counsel regarding same.			
2011.01.13 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to various communications among allied counsel re Judge Dlott's enforcement decision and whether Board of Elections will at long last comply. Attention to logistics of next Board of Election meeting and prospect for potential action.			
2011.01.14 Subodh Chandra	01:30	\$410.00	\$615.00
Edit motion to show cause; various communications with team; communications to client; respond to inquiries re Hunter case and contempt hearing.			

Item	Hrs / Qty	Rate / Price	Subtotal
2011.01.17 Subodh Chandra	00:18	\$410.00	\$123.00
Analyze and comment on opposition to motion for stay in Hunter case.			
2011.01.18 Subodh Chandra	00:18	\$410.00	\$123.00
Attention to and coordination of assignments vis-a-vis briefing schedule before Sixth Circuit in Hunter matter. Communication to co-counsel to ensure that docketing error is corrected (docket does not reflect that we were co-filers of Hunter's filing).			
2011.01.19 Subodh Chandra	00:30	\$410.00	\$205.00
Analyze and edit draft appellate brief; communications to coordinate filing efforts on expedited briefing schedule that Sixth Circuit has imposed. Attention to questions regarding oral-argument allocation.			
2011.01.20 Subodh Chandra	00:06	\$410.00	\$41.00
Respond to inquiry re case status.			
2011.01.21 Subodh Chandra	00:18	\$410.00	\$123.00
Obtain update re appellate argument; attention to Donald J. McTigue's comments regarding same.			
2011.01.27 Subodh Chandra	00:18	\$410.00	\$123.00
Analyze and discuss Sixth Circuit Hunter decision. Communications with team re same.			
2011.02.11 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to Hunter-related communications among co-counsel.			
2011.02.14 Subodh Chandra	00:30	\$410.00	\$205.00
Participate in conference call among co-counsel and allied counsel re en banc strategy. Further consideration of same and potential amicus counsel.			
2011.02.24 Subodh Chandra	00:48	\$410.00	\$328.00
Edit draft response to motion for en banc hearing in Sixth Circuit. Communications regarding same.			

Item	Hrs / Qty	Rate / Price	Subtotal
2011.02.25 Subodh Chandra	00:30	\$410.00	\$205.00
Further attention to draft responses for en banc hearing in Sixth Circuit by various respondents.			
2011.03.17 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Secretary of State Husted's latest advisory re counting of provisional ballots and co-counsel and allied counsel's commentary regarding same.			
2011.03.29 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to and communications among allied and co-counsel regarding Sixth Circuit decision affirming our earlier victory. Consideration of Supreme Court cert petition possibilities.			
2011.04.09 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Defendants' application to U.S. Supreme Court for stay of Sixth Circuit judgment.			
2011.04.12 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to communications among co-counsel regarding application to U.S. Supreme Court for stay and potential responses.			
2011.04.14 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to letter from Deter's office re application for stay and factual errors contained in same. Consideration of potential responses. Attention to various communications from co and allied counsel regarding latest brief draft.			
2011.04.15 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to communications from various co-counsel and allied counsel regarding brief draft. Attention to Supreme Court filing rules.			
2011.04.18 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to reply of petitioners in support of motion for stay.			
2011.05.27 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to belated discovery requests directed to clients and communication from co-counsel re same. Consideration of coordination of response and potential objections.			

Item	Hrs / Qty	Rate / Price	Subtotal
2011.06.06 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to agreed protective order and consideration of implications of same.			
2011.06.08 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Court's minutes of proceedings of discovery hearing and briefing schedule.			
2011.06.10 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to agreed order re transfer of supplies.			
2011.06.29 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to NEOCH objections to discovery requests.			
2011.07.12 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to communication from the Court and ensure coverage.			
2011.07.27 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Court's arrest warrant for witness and engage in various communications regarding same.			
2011.08.08 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to co-counsel's report regarding trial wrap up and Judge Dlott's order regarding filing of amended complaint. Attention to dialogue regarding drafting of same. Attention to communication of first draft of amended complaint.			
2011.08.10 Subodh Chandra	00:12	\$410.00	\$82.00
Analyze draft amended complaint and provide comments regarding same; attention to various comments by various allied parties' counsel.			
2011.08.12 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to response to motion for leave to file amended complaint.			
2011.08.26 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to various court filings by various Defendants.			

Item	Hrs / Qty	Rate / Price	Subtotal
2011.09.07 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Court's minutes of proceedings.			
2011.09.08 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to our response regarding motion to dismiss amended complaint.			
2011.09.19 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to notice of request for additional equitable relief.			
2011.09.22 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Defendant's reply in support of their motion to dismiss.			
2011.09.23 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Defendants' to Response to Motion re Motion to Dismiss Amended Complaint of Intervenor Plaintiffs NEOCH and ODP.			
2011.10.10 Research Expense		\$5.60	\$5.60
Pacer charges for July 1, 2011 through Sept. 30, 2011.			
2012.01.24 Subodh Chandra	00:06	\$410.00	\$41.00
Field inquiry from blogger re mediation, meaning someone from the defense camp leaked the existence of mediation in bad faith. Communications with co-counsel re handling of same.			
2012.01.25 Subodh Chandra	00:06	\$410.00	\$41.00
Internal communications regarding fee petition. Further handling of defense camp's leak of mediation leak.			
2012.01.31 Subodh Chandra	00:06	\$410.00	\$41.00
Communications with co-counsel attorneys' fees application and mediation status.			

Item	Hrs / Qty	Rate / Price	Subtotal
2012.02.01 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to communication from co-counsel and allied counsel to Judge Merz regarding cancellation of mediation due to bad-faith misbehavior by defendants. Further consideration of implications of same.			
2012.02.08 Subodh Chandra	00:42	\$410.00	\$287.00
Study Judge Lott's judgment and opinion; communications with co-counsel and client. Attention to notice of appeal filed. Consideration of timing issues associated with same.			
2012.02.09 Subodh Chandra	00:30	\$410.00	\$205.00
Review Court's co-counsel's correspondence with client. Correspondence with co-counsel; conference call with co-counsel; further consideration of same.			
2012.02.10 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to correspondence among counsel re strategy and consideration of issues raised in same.			
2012.02.13 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Hunter's notice to attorney general. Further consideration of procedural issues regarding same.			
2012.02.22 Subodh Chandra	00:06	\$425.00	\$42.50
Attention to notice of appeal.			
2012.02.24 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to defendants' motion for stay.			
2012.03.14 Subodh Chandra	00:12	\$410.00	\$82.00
Attention to reply to response to motion for stay. Consideration of implications of potential stay for clients' and allied parties' ability to obtain ultimate relief.			
2012.03.16 Subodh Chandra	00:06	\$410.00	\$41.00
Attention to Judge Dlott's decision denying stay.			
2012.03.31 Pacer Expense		\$0.16	\$0.16

Item	Hrs / Qty	Rate / Price	Subtotal
2012.04.05 Subodh Chandra	00:06	\$410.00	\$41.00
Communication with Jennifer Branch re court status of timing of attorneys' fees motion and need for related papers; attention to information regarding potential extension of deadline.			
2012.04.06 Subodh Chandra	00:06	\$410.00	\$41.00
Work on assembling fee declaration and related exhibit. Attention to Judge Dlott's decision extending deadline. Communications with J. Branch.			
2012.04.17 Subodh Chandra	01:12	\$410.00	\$492.00
Attention to Sixth Circuit order denying defendants' motion for stay. Analyze billing information for work product; draft declaration in support of fee petition. Assemble billing information from multiple billing systems. Exchange messages with Jennifer Branch re tomorrow's filing.			
2012.04.18 Subodh Chandra	03:42	\$410.00	\$1,517.00
Finalize fee declaration and editing and assembly of billing information and transmit to Jennifer Branch. Message to Branch and communications with her regarding filing. Attention to draft motion for attorneys' fees and costs as well as declarations from co-counsel and counsel for allied parties.			

	Subtotal	\$8,810.26
Total due by Oct 01, 2013		\$8,810.26
Previous Balance		\$0.00
Total Owing		\$8,810.26

retainer history

Disbursement

Retainer

No Data

Retainer Balance: \$0.00

Oct 18, 2013
Hunter v. Hamilton County Bd. of Education
Invoice # 235

T H E
CHANDRA
L A W F I R M L L C

Chandra Law Firm, LLC
1265 West 6th St., Suite 400
Cleveland, OH 44113.1326
216.578.1700 www.ChandraLaw.com

Billed To
Northeast Ohio Coalition for the Homeless, SEIU
Local 1199, et al.

invoice

Billable Time	\$1,700.00
Expenses	\$9.40
	\$1,709.40
Taxes	\$0.00
	\$1,709.40
Retainer Applied	\$0.00
	\$1,709.40
Previous Balance	\$8,810.26
Total Owing (due by: Oct 18, 2013)	\$10,519.66

invoice details

Item	Hrs / Qty	Rate / Price	Subtotal
2012.04.26 Subodh Chandra	00:18	\$425.00	\$127.50
Discussion with C. Gentry re appeal issues. Extensive correspondence re potential for raising issues with Judge Dlott regarding non-compliance.			
2012.05.04 Subodh Chandra	00:06	\$425.00	\$42.50
Attention to county's filing of motion for extension. Consideration of implications of same and internal communications.			
2012.06.08 Subodh Chandra	00:06	\$425.00	\$42.50
Attention to opposition brief re fees filed by Defendants.			
2012.10.17 Subodh Chandra	00:06	\$425.00	\$42.50
Attention to Court's order on motion to supplement attorneys' fees petition.			
2013.06.25 Subodh Chandra	00:06	\$425.00	\$42.50
Attention to Hunter reply in support of fee petition.			
2013.07.31 Subodh Chandra	00:12	\$425.00	\$85.00
Communications among counsel.			
2013.08.01 Subodh Chandra	00:18	\$425.00	\$127.50
Analysis, editing, and communications among counsel regarding supplementation of fee request.			
2013.08.15 Subodh Chandra	00:06	\$425.00	\$42.50
Attention to Judge Dlott's order denying equitable relief.			
2013.08.26 Subodh Chandra	00:06	\$425.00	\$42.50
Attention to order granting motion to file supplemental memorandum in support of Plaintiffs' motion for attorneys' fees.			
2013.09.30 Copy expense for September 2013		\$9.40	\$9.40

Item	Hrs / Qty	Rate / Price	Subtotal
2013.09.30 Subodh Chandra	01:18	\$425.00	\$552.50
Analyze Judge Dlott's 47-page fee opinion and communicate with co-counsel regarding same. Further consideration of same and complying with next steps required by Judge Dlott's decision.			
2013.10.01 Subodh Chandra	00:48	\$425.00	\$340.00
Discussions with paralegal and efforts to comply with Judge Dlott's fee order; analysis and review of billing, excise portions Judge Dlott ordered to be deleted. Communication to B. Davis, client rep. at NEOCH.			
2013.10.02 Subodh Chandra	00:06	\$425.00	\$42.50
Communications with J. Branch.			
2013.10.09 Subodh Chandra	00:06	\$425.00	\$42.50
Discussion with J. Branch re obligations under Judge Dlott's fee order and coordination of supplements.			
2013.10.18 Subodh Chandra	00:18	\$425.00	\$127.50
Communications with J. Branch. Finalization of billing exhibits and declaration for supplemental fee submission per Judge Dlott's order.			

	Subtotal	\$1,709.40
Total due by Oct 18, 2013		\$1,709.40
Previous Balance		\$8,810.26
Total Owing		\$10,519.66

retainer history

Disbursement

Retainer

No Data

Retainer Balance: \$0.00

worker summary

Summary	Taxes	Subtotal
Subodh Chandra		\$1,700.00
Suzanne Zaranko		\$9.40